

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In Re:

**HOUSTON REAL ESTATE
PROPERTIES, LLC,**

Debtor.

**JOHN QUINLAN, OMAR KHAWAJA,
AND OSAMA ABDULLATIF, *et al.*,**

Plaintiffs,

v.

**HOUSTON REAL ESTATE
PROPERTIES, LLC, *et al.*,**

Defendants.

§ **Chapter 7**

§

§ **Case No. 22-32998**

§

§

§

§

§

§

§

§

§

§

§

§

§

§

§

§

§

Adversary No. 23-03141

CYPRESS BRIDGECO, LLC’S RESPONSE TO MOTION FOR CONTINUANCE

Cypress BridgeCo, LLC opposes Ali Choudhri’s Motion for Continuance [Dkt. 537] because the sole basis for the requested delay—Mr. Choudhri’s unavailability to personally testify—is neither necessary nor relevant to the issues before the Court.

1. On February 27, 2025, BridgeCo filed an Emergency Motion to Expunge three (3) lis pendens recorded by Mr. Choudhri clouding title on a property that BridgeCo foreclosed on pursuant to this Court’s previous order. *See* Dkt. 533, BridgeCo Emergency Motion; *see also* Dkt. 155, Agreed Order Permitting Foreclosure. That same day, the Court entered an Order Setting Hearing [Dkt. 534] for March 3, 2025.

2. The following day, Mr. Choudhri filed a Response focusing exclusively on legal contentions related to this Court’s jurisdiction and interpretation of its prior orders. *See* Dkt. 536,

Choudhri Response to Emergency Motion to Expunge; *see also* Dkt. 539 and 540, Amended Response to Emergency Motion to Expunge (maintaining same substantive arguments and attaching exhibits).

3. Mr. Choudhri now requests a continuance of the March 3rd hearing due to an apparent conflict that would preclude him from attending the hearing.

4. The Court's consideration of the pending Emergency Motion, though, can and should be addressed through argument by counsel. The sole basis for Mr. Choudhri's opposition is a legal one that does not require witness testimony.

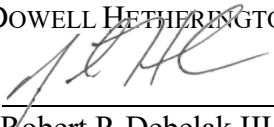
5. Granting the continuance would only cause unnecessary delay in a matter that directly impacts BridgeCo's ability to complete the sale of property this Court permitted the foreclosure of.

CONCLUSION

Accordingly, Cypress BridgeCo, LLC respectfully requests that the Court deny the Motion for Continuance and proceed with the scheduled hearing on March 3, 2025.

Dated: March 3, 2025

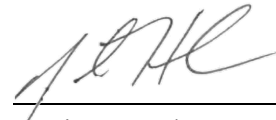
McDOWELL HETHERINGTON LLP

By: 
Robert P. Debelak III
Texas Bar No. 24078410
Justin R. Huber
Texas Bar No. 24132916
1001 Fannin Street, Suite 2400
Houston, TX 77002
P: 713-337-5580
F: 713-337-8850
E: bobby.debelak@mhlhp.com
justin.huber@mhlhp.com

Counsel for Cypress BridgeCo, LLC

CERTIFICATE OF SERVICE

I certify that, on the date set forth above, I cause a copy of the foregoing motion to be served via the Electronic Case Filing System in accordance with the Federal Rules of Bankruptcy Procedure.



Justin R. Huber